

MEMO ENDORSED

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June 14, 2022

VIA ECF

Hon. Valerie E. Caproni
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *A.C., et. al. v. N.Y.C Dep't of Educ., No. 22-cv-4182 (VEC)(KHP)*

Dear Judge Caproni:

I am Special Assistant Corporation Counsel in the office of Corporation Counsel, the Hon. Sylvia O. Hinds-Radix, attorney for Defendant in the matter referenced above, wherein Plaintiff seeks solely attorneys' fees, costs and expenses for legal work on an administrative hearing under the Individuals with Disabilities Education Act 20 U.S.C. §1400, *et. seq.* ("IDEA"), as well as for this action.

I write to respectfully request a 90-day extension of Defendant's time to respond to the complaint from June 15, 2022 to September 14, 2022 and the adjournment of the Initial Pre-Trial Conference (IPC) scheduled for August 12, 2022, *sine die*. This is the first request for an extension and Plaintiff consents. The extension will give this office time to complete the City's internal review process, begin settlement negotiations and hopefully resolve this matter without the need for a conference or motion practice.

Accordingly, Defendant respectfully requests that the Court accept this submission and extend Defendant's deadline to respond to the complaint to September 14, 2022, and adjourn the IPC *sine die*.

Thank you for considering this request.

Respectfully submitted,

Simone Nicholson

/s/ 
Special Assistant Corporation Counsel

cc: Irina Roller, Esq. (via ECF)

Application GRANTED.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: June 14, 2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE